

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DM 05-172

Respondent: John Puopolo
Title: Director - Construction

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up Topic 2

DATED: May 30, 2006

ITEM: Staff 3-39A Follow-Up VZ – Please confirm the estimate that 95% of the poles on the VZ system are not climbed is reasonably accurate. If 95% is not deemed a reasonably accurate estimate, please provide one that is done on a best faith basis.

REPLY: After further review by Verizon NH's construction organization, the estimate of the number of poles that Verizon NH's construction forces do not climb, provided by Verizon NH's engineering representative at the May 30th technical session, is hereby revised. Information responsive to the request regarding the actual number of poles climbed is not maintained in the ordinary course of business, and thus is not available. However, Verizon NH would say that the number of poles climbed is very much dependent on the region in which the work is being performed and the type of equipment available for pole work activity. Without data on the actual pole activity work performed by Verizon NH technicians, Verizon would make a "best faith estimate" (as requested) that the percentage of poles not climbed may range from 80% to 90%.

VZ #189

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DM 05-172

Respondent: John Puopolo
Title: Director - Construction

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up Topic 2

DATED: May 30, 2006

ITEM: Staff 3-39B Follow-Up VZ – Please show how the estimated 95% of the VZ poles that are not climbed are inspected continuously as stated.

REPLY: As stated in Verizon NH's reply to Staff 3-39A Follow-Up, the actual percentage of poles not climbed is likely less than 95%.

Verizon NH's outside plant forces, including construction and repair, have many opportunities to visit pole locations. Prior to contact with any pole, Verizon NH technicians are trained to visually inspect poles and test for foreign voltage before performing any pole related work activity.

Prior to working on a pole, Verizon NH construction personnel test a pole's safety. This is done regardless of whether the pole is 1) ascended using "climbers"; 2) worked on using a ladder; or 3) worked on from an aerial lift device.

All Verizon NH outside forces receive formal instructor-led pole training when first entering the construction department. This training includes educating the technicians on all of the approved methods used to test poles for safety. Training is reinforced annually with all employees as a requirement of Verizon's Safety Knowledge Review Program.

VZ #190

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DM 05-172

Respondent: John Puopolo
Title: Director - Construction

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up Topic 2

DATED: May 30, 2006

ITEM: Staff 3-39C Follow-Up VZ – Please supply the detailed training program that VZ personnel receive for inspections required by the National Electrical Safety Code.

REPLY: Please see Verizon NH's reply to Staff 1-29, Attachment III.

VZ #191

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DM 05-172

Respondent: John Puopolo

Title: Director - Construction

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up Topic 2

DATED: May 30, 2006

ITEM: Staff 3-5G Follow-Up VZ – Please confirm that holidays, vacation, and sick time are not included in your response.

REPLY: Verizon NH's reply to Staff 3-5E did not include holiday, vacation or sick time. However, in reviewing its response, Verizon NH did discover two errors with respect to Verizon NH's responses to Staff 3-5E and 3-5F, for which errata responses are being filed.

VZ #193

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DM 05-172

Respondent: John Puopolo
Title: Director - Construction

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up Topic 2

DATED: May 30, 2006

ITEM: Staff 3-5H Follow-Up VZ - Please reconcile the number of workdays available for non-FTTP work by month in this response to the number of workdays available in your response to 3-5E.

REPLY: Please see Verizon NH's errata response to Staff 3-5E.

VZ #194

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DM 05-172

Respondent: Serge Laprise
Title: Manager – OSP Engineering

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up Topic 2

DATED: May 30, 2006

ITEM: Staff 3-26D Follow-Up VZ – Please submit all documentation including, but not limited to e-mails, notations, etc., and provide the substance of any telephone conversations (internal and external) regarding your engineer's review of the requests to participate in tree removal depicted in the photographs supplied by PSNH to its response to 3-26C. As part of your response, please supply the logic or reasoning why VZ decided to participate or not participate in cost sharing for these examples.

REPLY: Verizon NH's review and disposition of the Exchange of Notices relating to danger tree removals depicted in photographs supplied by PSNH in its response to Staff 3-26C Follow-Up is summarized in the attached series of emails between Verizon NH's Vice President of Regulatory and the Director and Managers of engineering (see Attachments 1 and 2). These emails, which reflect that Verizon NH did review the Exchange of Notice requests for the specified locations, sets forth Verizon's rationale for why participation was denied.

VZ #196

**Verizon New England Inc.
d/b/a Verizon New Hampshire**

State of New Hampshire

Docket No. DM 05-172

Respondent: Troy McDonald

Title: Joint Lines Specialist – ME, VT, NH

Respondent: Serge Laprise

Title: Manager – OSP Engineering

REQUEST: New Hampshire Utilities Commission Staff, Set 3 Follow-Up Topic 2

DATED: May 30, 2006

ITEM: Staff 3-44A Follow-Up All – Does your company believe that the other companies with whom you have an IOP are conforming to their respective IOPs for pole maintenance, trimming, or inspections. If not, please specifically describe why not for each instance. For companies with an IOP with more than one other company, please supply a separate response for each.

REPLY: From time to time, any company operating with an IOP arrangement can unintentionally or otherwise occasionally take actions that are not in conformance with the IOP. To be responsive to the question without seeking to criticize its business partners, Verizon NH highlights the following instances when others have not acted consistent with the IOPs. These examples are illustrative only and are not intended to be an exhaustive list of all such instances.

Unitil:

IOP #17 - Joint Trim (2005): IOP #17 provides Verizon NH and Unitil with the option of choosing not to participate in maintenance tree trimming if either party does not feel there is a benefit to joint participation. Irrespective of Verizon NH's notification to Unitil that it would not participate in certain maintenance trimming, Unitil has continued to invoice Verizon NH for 25% of all maintenance trimming expenses. This creates an administrative problem for Verizon NH, as each line item of every invoice must be reviewed to confirm that the trim

VZ #192

REPLY: (Cont'd)

Unitil:(cont'd)

expense represented an instance in which Verizon NH agreed to participate in joint trimming. In that regard, it should be noted that on three separate occasions studies were performed that established that Unitil was charging Verizon NH for sections: 1) where Verizon NH was not attached to the pole line; 2) in locations of the state that did not include a Verizon NH serving area; or 3) that involved trimming for power company space only.

Attached are letters sent to Unitil conveying Verizon NH's concern with the error rates in trim invoicing (see Attachments 1 through 3). The letters reflect 47.8%, 53.5% and 97% error rates, respectively, for the relevant periods. Unitil previously included Attachment 1 in its response to Staff 3-25; however, it neglected to include the second page of the document, which detailed the findings of Verizon NH's study of Unitil's invoice errors.

IOP #17 - Joint Trim (2004): During year 2004 Unitil did not follow Item 5(a) of IOP #17 requiring it to provide an Exchange of Notice (EON) for Verizon NH's review and agreement of sections to be trimmed. Item 5(e) of IOP #17 provides that Unitil is to accept financial responsibility for any "uncoordinated" trimming. Unitil continues to invoice Verizon NH for 25% of all 2004 trim costs.

IOP #17 - Joint Trim Billing: If Unitil decides to employ a trim vendor that is not on Verizon NH's approved contractor list, Item 5(d) requires Unitil to pay for the trimming and invoice Verizon NH 25% of the trim expense associated with the trim sections for which Verizon NH agreed to participate. While Verizon NH and Unitil have met regarding this practice, Unitil is now refusing to include a copy of the signed EON to support invoicing. This invoicing practice creates additional administrative work within the bill processing center. Verizon NH billing staff must track down EONs and attempt to match them with the correct invoice package. This activity adds additional time to the bill payment process.

**IOP #9 Item 2 - Removal of Jointly Owned Poles &
IOP #13 Item 1B - Request to Transfer Construction:**

Unitil will routinely send one transfer notice to all attachees once it has set a pole within its maintenance area and transferred its wires. As a result, Verizon NH does not receive proper notification because other attachees have not transferred. This practice impacts the 60-day

REPLY: (Cont'd)

Unitil:(cont'd)

time period contained in the Verizon NH – Unitil IOP.

In addition, apparently as a result of this proceeding, Unitil has begun to address its backlog of transfer notifications. Recently, Unitil served Verizon NH approximately 120 notifications for pole transfers in its Capital area. While the work associated with these notifications did not all occur in one day, Unitil apparently is seeking to claim that the IOP imposes the removal obligation on Verizon NH if Verizon NH does not complete all transfer work within 60 days. These types of backlog situations should be addressed outside of the IOP benchmarks, as Unitil cannot reasonably hold work in an attempt to force costs upon Verizon NH.

Public Service of New Hampshire (PSNH):

IOP #10 - Removal of Joint Poles: Prior to Verizon NH's initiating an electronic exchange of notice process, PSNH would routinely send one transfer notice to all attachees once it had set the pole and transferred its wires. As a result, Verizon NH would not receive proper notification because other attachees had not transferred. This practice impacts the 60-day rule contained in the Verizon NH – PSNH IOP. Also, it has been a challenge for both Verizon NH and PSNH to determine to which dual poles in PSNH's maintenance areas the 60-day clock applies.

National GRID (NGRID):

IOP "N" - Monthly Billing Procedure: NGRID has been behind in the Joint Ownership billing process. NGRID was first contacted regarding this issue in 2005 to address the fact that, beginning in 2003, it had not returned the necessary paperwork (form 1045) to allow Verizon NH to prepare the monthly invoices relating to the net pole and anchor sets between both companies. NGRID's explanation was it lacked staffing to perform the necessary function. Since this initial contact, one year ago, NGRID has completed the 1045 billing process for 2003 but has not completed the process for years 2004 and 2005. It also is not current for year 2006.